

REMARKS/ARGUMENTS

This Amendment is responsive to the Office Action dated May 16, 2007, setting forth a shortened three month statutory period for reply expiring on August 16, 2007.

In short review, claims 11, 13 and 15-20 were rejected under 35 U.S.C. §112, second paragraph as being indefinite. Claims 1-3 and 5-9 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 7,064,601 to Kwak, et al. ("*Kwak*"). Claim 14 was rejected under 35 U.S.C. 102(b) as being anticipated by two references, U.S. Patent No. 5,144,223 to Gillingham ("*Gillingham*") and U.S. Patent No. 6,204,724 to Kobatake ("*Kobatake*"). Claim 14 was rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application No. 2004/0027194 to Morishita ("*Morishita*").

Claims 1, 5, 6, 14 and 18 have been amended and claims 21 and 22 have been added. Claims 1-3, 5-9, 11, 13-22 remain in the application. All claims are believed to be allowable over the cited art.

CLAIM OBJECTION

Applicant has amended claim 18 in accordance with the requirements outlined in the Office Action and therefore respectfully requests that the claim objection be withdrawn.

RESPONSE TO CLAIM REJECTIONS UNDER 35 U.S.C. 112

Claim 11 was rejected under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. More specifically, the Office Action regards the limitation "wherein the pull-down transistor has one end coupled with the floating current mirror" as misdescriptive since is not shown in any of the Applicant's drawings. Applicant respectfully disagrees. The drawings cited in the Office Action show an intervening element between the floating current mirror and the pull-down transistor – either transistor M6 (voltage follower) in Figure 2 or transistor M26 (protection) in Figure 3. However, the floating current mirror is "coupled" with the pull-down transistor based on the ordinary meaning of "coupled."

The claim term "coupled" does not mean the same thing as "directly coupled." The claim term directly coupled means "electrically connected with no intervening elements," whereas coupled means "electrically connected" or "connected by a conductive path" and therefore may

have other elements in the path that do not have to be part of the claim. *IEEE Standard Dictionary of Electrical and Electronics Terms* (6th Ed. 1988) (coupling: the association of two or more circuits or systems in such a way that power or signal information may be transferred from one to another); *Modern Dictionary of Electronics* (7th Ed. 1999) (coupling: the association or mutual relationship of two or more circuits or systems in such a way that power may be transferred from one to another).

The case law is consistent with this definition. *Silicon Graphics, Inc. v. Nvidia Corp.*, 58 F. Supp. 2d 331, 346 (D. Del. 1999) ("The court notes that the ordinary and accustomed meaning of the term "couple," even when used in an electronics context does not solely mean "directly coupled." The court . . . determines that the ordinary meaning in this context is "coupled or connected, directly or indirectly."); *Intel Corp. v. Broadcom Corp.*, 172 F. Supp. 2d 516, 548 (D. Del. 2001); ("As stated previously, the term "coupled" means electronically connected, either directly or indirectly."); *Verizon California Inc. v. Katz*, 326 F. Supp. 2d 1060, 1077-78 (C.D. Cal. 2003) ("Coupled" means associated in such a way that power or signal information may be transferred from one to another.")

Because this proposed amendment to the specification is consistent with the dictionary definitions as well as the case law interpreting the term "coupling," the Applicant respectfully submits that such an amendment to the specification does not add new matter to the application. Applicant respectfully requests that the rejection under §112 be withdrawn for independent claim 11 and dependent claims 13, and 15-20.

RESPONSE TO CLAIM REJECTIONS UNDER 35 U.S.C. 102

Claims 1-3 and 5-9 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 7,064,601 to Kwak, et al. ("Kwak"). This rejection is respectfully traversed.

Claim 1 has been amended to recite, in part, a floating current mirror having a "'plurality of transistors" and "wherein each source node of the plurality of transistors forming the floating current mirror are directly coupled together," "wherein the source node of each transistor forming the floating current mirror is not directly coupled to a ground node," and "wherein the source node of each transistor forming the floating current mirror is not directly coupled to a supply voltage node." It should be noted that Figure 3 of Kwak, which is cited as anticipating claim 1 of the present application, is substantially identical to Figure 1 of the present application,

which is discussed in the "Background of the Invention" section of the specification. In addition, Figure 3 of Kwak fails to teach or suggest either the coupling together of the source nodes of the transistors forming the current mirror and the source nodes not directly coupled to a ground node or a supply voltage node. For at least these reasons, independent claim 1 is believed to be allowable over the cited prior art. Because dependant claims dependent claims 2, 3 and 5 depend from and further limit independent claim 1, dependant claims 2, 3 and 5 are also believed to be allowable.

Claim 6 has been amended to recite, in part, providing a current mirror circuit portion "having a plurality of transistors" and "wherein each source node of said plurality of transistors forming the current mirror are directly coupled together, wherein the source node of each transistor forming the floating current mirror is not directly coupled to a ground node, and wherein the source node of each transistor forming the floating current mirror is not directly coupled to a ground node." As stated above, Figure 3 of Kwak fails to teach or suggest either the coupling together of the source nodes of the transistors forming the current mirror and the source nodes not directly coupled to a ground node or a supply voltage node. For at least these reasons, independent claim 6 is believed to be allowable over the cited prior art. Because dependant claims dependent claims 7-9 depend from and further limit independent claim 6, dependant claims 7-9 are also believed to be allowable.

Claim 14 was rejected under 35 U.S.C. 102(b) as being anticipated by two references, U.S. Patent No. 5,144,223 to Gillingham ("*Gillingham*") and U.S. Patent No. 6,204,724 to Kobatake ("*Kobatake*"). Claim 14 was rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application No. 2004/0027194 to Morishita ("*Morishita*"). All three rejections are respectfully traversed.

Claim 14 has been amended to recite, among other things, a floating current mirror including a first transistor and a second transistor "wherein a source node of the first transistor is directly coupled to the source node of the second transistor" and "wherein the source nodes of the first and second transistors are not directly coupled to a ground node and wherein the source nodes of the first and second transistors are not directly coupled to a supply voltage node." Figure 5 of *Gillingham*, Figure 8 of *Kobatke*, and Figure 11 of *Morishita* all fail to teach or suggest either the coupling together of the source nodes of the transistors forming the current mirror and the source nodes not directly coupled to a ground node or a supply voltage node.

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For at least these reasons, independent claim 14 is believed to be allowable over the cited prior art.

NEW CLAIMS

Claim 21 has been added that further defines the floating MOSFET current mirror as having a pair of p-channel transistors. New claim 22 has been added that further defines that the floating current mirror is coupled to the pull-down transistor through an intervening MOSFET transistor. Since both claims 21 and 22 are dependent on an allowable base claim, claim 1 and claim 11 respectively, dependent claims 21 and 22 are believed to be allowable over the cited art as well.

CONCLUSION

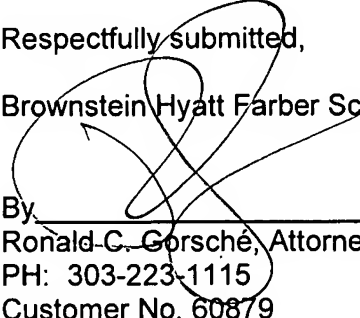
No fees are due with this Response. It is noted that the attorney's Docket number has been changed from 2059/US/2 to 10467.0015/US/1, and going forward the 10467.0015/US/1 will be used as the Attorney Docket number.

If the Examiner has any questions regarding this Amendment, please contact the undersigned at 303-223-1115.

Respectfully submitted,

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By 

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